

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

CARLA HOOVER
5641 Westlake Dr.
Galloway, Ohio 43119

:

Case No.:

And

:

JUDGE

EMILY HAUDENSCHILD
604 Meadows Dr.
Marysville, Ohio 43040

:

MAGISTRATE JUDGE

:

And

:

BRITTANY YATES
288 Amsterdam Ave.
Columbus, Ohio 43207

:

:

And

:

**JURY DEMAND
ENDORSED HEREON**

DANIELLE CALDERON
6635 Wesburg Park Ave.
Apt 301
Columbus, Ohio 43235

:

:

:

And

:

ASHLEY GRAVES
3600 Spangler Rd.
Columbus, Ohio 43207

:

:

And

:

CHELSEA PAIGE EWART
5822 N. Meadows Blvd.
Apt B
Columbus, Ohio 43229

:

:

Plaintiffs

:

-v- :

STEVEN G. ROSSER, individually :
c/o Columbus Division of Police :
120 Marconi Blvd. :
Columbus, Ohio 43215 :

And :

WHITNEY LANCASTER, individually :
c/o Columbus Division of Police :
120 Marconi Blvd. :
Columbus, Ohio 43215 :

And :

John or Mary Doe 1, in his or her :
Individual capacity :
c/o Columbus Division of Police :
120 Marconi Blvd. :
Columbus, Ohio 43215 :

And :

John or Mary Doe 2, in his or her :
Individual capacity :
c/o Columbus Division of Police :
120 Marconi Blvd. :
Columbus, Ohio 43215 :

Defendants.

I. Preliminary Statement

1. The case seeks compensatory and punitive damages, costs, and attorneys' fees for malicious prosecution, and, alternatively, abuse of process, in violation of the Fourth and Fourteenth Amendments of the United States Constitution and/or the common law of the State of Ohio, committed when Defendants, charged, and in some instances, arrested and thereafter attempted to prosecute Plaintiffs without probable cause.

II. Jurisdiction and Venue

2. Jurisdiction over claims brought under Civil Rights Act of 1871, 42 U.S.C. §1983, is conferred on this Court by 28 U.S. C. § 1331 (federal question; §1343 (civil rights), and jurisdiction over the state claims is conferred by 28 U.S.C. §1367 (supplemental jurisdiction).

3. Compensatory and punitive damages are sought pursuant to 42 U.S.C. §1983; the common law of the State of Ohio; and 28 U.S.C. §2201 and §2202.

4. Costs and attorneys' fees may be awarded pursuant to 42 U.S.C. §1988, the common law of the State of Ohio and Fed. R. Civ. P 54.

5. Venue is proper pursuant to 28 U.S.C. §1391(b) and S.D. Ohio Civ. R. 82.1(b), because the events giving rise to this action occurred in Franklin County, Ohio, where Defendants serve as CDP Vice Unit members or in other CDP employment.

III. Parties

6. Plaintiff Carla Hoover ("Ms. Hoover"), is a resident of Franklin County, Ohio, at all times material to this Complaint, worked at Kahoots Gentlemen's Club ("Kahoots") and never had been arrested, charged or convicted of a criminal offense excluding traffic violations.

7. Plaintiff Emily Haudenschild ("Ms. Haudenschild"), is a resident of Franklin County, Ohio, at all times material to this Complaint, worked at Kahoots and never had been arrested, charged or convicted of a criminal offense excluding traffic violations.

8. Plaintiff Brittany Yates ("Ms. Yates"), is a resident of Franklin County, Ohio, at all times material to this Complaint, worked at Kahoots and never had been arrested, charged or was convicted of a criminal offense excluding traffic violations.

9. Plaintiff Danielle Calderon (“Ms. Calderon”), is a resident of Franklin County, Ohio, at all times material to this Complaint, worked at Kahoots and never had been arrested, charged or was convicted of a criminal offense excluding traffic violations..

10. Plaintiff Ashley Graves (“Ms. Graves”), is a resident of Franklin County, Ohio, at all times material to this Complaint, worked at Kahoots and never had been arrested, charged or was convicted of a criminal offense excluding traffic violations..

11. Plaintiff Chelsea Paige Ewart (“Ms. Ewart”), is a resident of Franklin County, Ohio, at all times material to this Complaint, worked at Kahoots.

12. Defendants (collectively “Defendant Officers”) Whitney Lancaster (“Defendant Lancaster”), Steven Rosser (“Defendant Rosser”), John or Mary Doe 1 (“Defendant Doe 1”), John or Mary Doe 2 (“Defendant Doe 2”) are being sued in their individual capacity; and were, at all times material to this Complaint, employees of the City of Columbus, Columbus Police Department in the Vice Unit (“Vice Unit”) located in Franklin County, Ohio and “persons” under 42 U.S.C. §1983 acting under color of law.

IV. Facts

13. Vice Unit officers, including Defendant Officers, are intimately aware of all of the elements for the limited set of laws they are charged with enforcing.

14. In filing criminal complaints, Defendant Officers have access to and routinely use a book containing the elements of City and State criminal offenses, including the elements associated with R.C. 2907.40(C)(2).

15. A violation of R.C. 2907.40(C)(2) requires: (1) an employee who regularly appears nude or seminude; (2) at the sexually oriented business; (3) while they are nude or seminude; (4) to touch another employee, a patron, or allow themselves to be touched by a patron.

16. “Patron” is defined by Ohio Revised Code 2907.40(A)(8) is “any individual on the premises of a sexually oriented business except for any of the following:...(c) A public employee...acting within the scope of the public employee’s...duties as a public employee..”

17. At all relevant times hereto, Defendants were public employees acting within the scope of their duties as a public employee.

18. At all relevant times hereto, upon information and belief, Defendants were aware, based upon communication with their superiors and the Columbus City Attorney’s Office that enforcing the above-mentioned statute could not be enforced especially when using undercover officers as patrons.

19. At all relevant times hereto, upon information and belief. Defendants were told that charges could not be brought against an individual, similarly situated to Plaintiffs, when there is contact between a police officer and an employee of a club such as Kahoots.

20. In or around 2017, Defendant Rosser and Defendant Lancaster spent numerous hours at Kahoots while in their official capacity.

21. Defendant Rosser and Defendant Lancaster targeted Kahoots and selective employees including Plaintiffs’ without any legal justification.

22. At all relevant times hereto, Kahoots hired Jeremy Sokol (“Mr. Sokol”) as a bouncer.

23. Mr. Sokol and Defendant Rosser and/or Defendant Lancaster knew each other prior to Mr. Sokol being hired by Kahoots when Mr. Sokol worked at other clubs.

24. Mr. Sokol represented to the public, including some of the named Plaintiff, that he worked with Defendant Rosser and he could get anyone arrested or in trouble if he so desired.

25. Mr. Sokol had employees of Kahoots he liked and employees of Kahoots he disliked.

26. Upon information and belief, Plaintiffs were employees who Mr. Sokol did not like because said Plaintiffs would not engage in any illegal conduct nor would Plaintiffs comply with demands and requests made by Mr. Sokol.

27. Defendants Rosser and/or Lancaster targeted Plaintiffs without probable cause or any legal justification.

28. On or about September 8, 2017, Kahoots, by and through, its general manager, Joe Vaillancourt, fired Mr. Sokol.

29. After Mr. Sokol was fired, in or around October 2017, Defendant Rosser approached the owner(s) of Kahoots and threatened that if Mr. Sokol was not rehired by Kahoots, Defendant Rosser would “file a bunch of tickets” and implied he would close Kahoots.

30. Defendant Rosser demanded the owner(s) of Kahoots to fire its current general manager Joseph Vaillancourt or again he implied he would close Kahoots.

31. Defendant Rosser demanded Mr. Sokol be rehired by the end of October of 2017.

32. Defendant Rosser claimed Mr. Sokol was part of a “Liaison Program” to ensure Kahoots was in compliance with community standards. Defendant Rosser stated, “Mr. Sokol has proven to be trustworthy and reliable throughout, and we intend to continue honoring our agreement in regard to not filing violations with the Commission that are obtained via information provided to us by the Club’s Liaison.”

33. As a result of the threats and demands made by Defendant Rosser, on or about December 6, 2017, Kahoots rehired Mr. Sokol.

34. Prior to Kahoots succumbing to the threats and/or extortion of Defendant Rosser, Defendants filed a number of charges against employees of Kahoots, without probable cause, including the named Plaintiffs to retaliate and/or punish Kahoots and their employees.

35. Upon information and belief, Defendants Rosser and Lancaster had a personal and potentially financial interest in Mr. Sokol working at Kahoots.

36. At all relevant times hereto, Defendants had knowledge that a criminal charge under R.C. 2907.40(C)(2), could not be brought against Plaintiffs based upon what they were told by the City Attorney.

a. Facts As it Relates to Carla Hoover

37. On November 9, 2017, Defendant Rosser executed an affidavit in support of probable cause against Ms. Hoover.

38. In the affidavit, Defendant Rosser stated that on October 27, 2017, Defendants Rosser and Defendant Lancaster entered Kahoot's Gentlemen's Club as a result of multiple complaints. Defendant Rosser stated "Dixie" who was later identified as Ms. Hoover requested a private dance from Defendant Rosser. Defendant Rosser stated Dixie rubbed her breasts on him and he touched her breasts. A more detailed summary of what was stated in the Affidavit is attached hereto and incorporated herein as Exhibit A.

39. On November 9, 2017, Defendant Rosser swore out a criminal complaint against Ms. Hoover charging her with a violation of R.C. 2907.40(C)(2). A copy of the complaint is incorporated herein as Exhibit B.

40. Upon being served with the criminal complaint, Ms. Hoover hired counsel and entered a plea of not guilty.

41. Thereafter, Ms. Hoover was challenging the complaint as she was not working on the day Defendant Rosser claimed she engaged in criminal conduct.

42. When Defendants became aware Ms. Hoover was challenging the charge, on February 15, 2018, Defendant Lancaster filed a second criminal complaint against Ms. Hoover alleging on October 28, 2017, she violated R.C. 2907.40(C)(2). A copy of the complaint is incorporated herein as Exhibit C.

43. Upon being served with the criminal complaint, Ms. Hoover hired counsel and entered a plea of not guilty.

44. At the time Defendants Lancaster and Rosser knew that they did not have probable cause to charge Ms. Hoover.

45. Criminally charging Ms. Hoover was for other ulterior motives that violated her Constitutional rights.

46. In order to charge Ms. Hoover for the violation, Defendants Rosser and Lancaster knowingly and intentionally made false statements in a sworn criminal complaint.

47. In addition to the fabrication, in filling out the sworn criminal complaint, Defendants Rosser and Lancaster knew that they were not a “patron” as defined by R.C. 2907.40(A)(8).

48. Rather, Defendant Officers were aware that they had deliberately fabricated and/or omitted the elements of R.C. 2907(C)(2) to charge Ms. Hoover.

49. On May 21, 2018 and July 23, 2018, the charges filed against Ms. Hoover were dismissed.

b. Facts As It Relates to Emily Haudenschild

50. On March 8, 2018, Defendant Rosser swore out a criminal complaint against Ms. Haudenschild charging her with a violation of R.C. 2907.40(C)(2) that occurred on or about January 20, 2018. A copy of the complaint is incorporated herein as Exhibit D.

51. Upon being served with the criminal complaint, Ms. Haudenschild hired counsel and entered a plea of not guilty.

52. At the time Defendant Rosser knew he did not have probable cause to charge Ms. Haudenschild.

53. Criminally charging Ms. Haudenschild was for other ulterior motives that violated her Constitutional rights.

54. In filling out the sworn criminal complaint, Defendant Rosser knew he was not a “patron” as defined by R.C. 2907.40(A)(8).

55. On or about August 24, 2018, the charge filed against Ms. Haudenschild was dismissed.

c. Facts As It Relates to Brittany Yates

56. On November 7, 2017, Defendant Rosser swore out a criminal complaint against Ms. Yates charging her with a violation of R.C. 2907.40(C)(2) that occurred on or about September 22, 2017. A copy of the complaint is incorporated herein as Exhibit E.

57. Upon being served with the criminal complaint, Ms. Yates hired counsel and entered a plea of not guilty.

58. At the time Defendant Rosser knew he did not have probable cause to charge Ms. Yates.

59. Criminally charging Ms. Yates was for other ulterior motives that violated her Constitutional rights.

60. In filling out the sworn criminal complaint, Defendant Rosser knew he was not a “patron” as defined by R.C. 2907.40(A)(8).

61. On or about November 27, 2018, the charge filed against Ms. Yates was dismissed.

d. Facts As It Relates to Danielle Calderon

62. On December 8, 2017 Defendant Rosser swore out a criminal complaint against Ms. Calderon charging her with a violation of R.C. 2907.40(C)(2) that occurred on or about September 29, 2017.

63. Upon being served with the criminal complaint, Ms. Calderon hired counsel and entered a plea of not guilty.

64. At the time Defendant Rosser knew he did not have probable cause to charge Ms. Calderon.

65. Criminally charging Ms. Calderon was for other ulterior motives that violated her Constitutional rights.

66. In filling out the sworn criminal complaint, Defendant Rosser knew he was not a “patron” as defined by R.C. 2907.40(A)(8).

67. On or about November 27, 2018, the charge filed against Ms. Calderon was dismissed.

e. Facts As It Relates to Ashley Graves

68. On November 10, 2017, Defendant Lancaster swore out a criminal complaint against Ms. Graves charging her with a violation of R.C. 2907.40(C)(2) that occurred on or about September 15, 2017. A copy of the complaint is incorporated herein as Exhibit F.

69. Upon being served with the criminal complaint, Ms. Graves hired counsel and entered a plea of not guilty.

70. At the time Defendant Lancaster knew he did not have probable cause to charge Ms. Yates.

71. Criminally charging Ms. Graves was for other ulterior motives that violated her Constitutional rights.

72. In filling out the sworn criminal complaint, Defendant Lancaster knew he was not a “patron” as defined by R.C. 2907.40(A)(8).

73. On or about August 16, 2018, the charge filed against Ms. Graves was dismissed.

f. Facts As It Relates to Chelsea Ewart

74. On November 13, 2017, Defendant Lancaster swore out a criminal complaint against Ms. Ewart charging her with a violation of R.C. 2907.40(C)(2) that occurred on or about September 15, 2017. A copy of the complaint is incorporated herein as Exhibit G.

75. Upon being served with the criminal complaint, Ms. Ewart hired counsel and entered a plea of not guilty.

76. At the time Defendant Lancaster knew he did not have probable cause to charge Ms. Ewart.

77. Criminally charging Ms. Ewart was for other ulterior motives that violated her Constitutional rights.

78. In filling out the sworn criminal complaint, Defendant Lancaster knew he was not a “patron” as defined by R.C. 2907.40(A)(8).

79. On or about August 16, 2018, the charge filed against Ms. Ewart was dismissed..

80. Defendants' acts or omissions were done with malicious purpose, in bad faith, or in a wanton or reckless manner.

81. As a proximate result of Defendants' acts, Plaintiffs have suffered and continue to suffer damages, including loss of liberty, legal and other expenses, mental and emotional anguish, embarrassment, fear, and great inconvenience.

82. Plaintiffs' rights to be free from unlawful search and seizure and from arrest and prosecution without probable cause and/or based on false statements were, at the time of their actions or omissions, clearly established rights guaranteed by the Fourth and Fourteenth Amendments to the United States Constitution.

83. At all relevant times, the Defendant Officers were acting within the course and scope of their employment with the City of Columbus Division of Police entitling Defendant Officers to be indemnified by City of Columbus Division of Police.

V. Claims for Relief

A. First Cause of Action: Malicious Prosecution in Violation of the Fourth and Fourteenth Amendments and Ohio Common Law.

84. Paragraphs 1 through 83 above are realleged and incorporated herein.

85. By making, influencing, and/or participating in the decision to prosecute Plaintiffs' without probable cause, which prosecution was resolved in their favor by dismissal at the unilateral request of the prosecutor due to the lack of probable cause, and does so with knowingly or recklessly made false statements in their paperwork, Defendant Officers maliciously prosecuted Plaintiffs, resulting in their deprivation of liberty.

B. Second Cause of Action: Civil Conspiracy to Violate the Fourth and Fourteenth Amendment

86. Paragraphs 1 through 85 above are realleged and incorporated herein.

87. Defendant Officers along with unnamed co-conspirators, conspired against Plaintiffs' in order to conceal their retaliation against Plaintiffs and Kahoots, by depriving them of their Fourth and Fourteenth Amendment rights and taking steps to further the conspiracy, such as arresting them without probable cause, unlawfully searching and seizing their persons and property, making knowingly or recklessly false statement in their paperwork, making, influencing, and/or participating in the decision to prosecute them without probable cause, thereby causing Plaintiffs damages.

C. Third Cause of Action: Abuse of Process in Violation of Ohio Common Law

88. Paragraphs 1 through 87 above are realleged and incorporated herein.

89. In the alternative, by commencing criminal prosecution in proper form and with probable cause and perverting that prosecution to retaliate against Plaintiffs and Kahoots thereby cause Plaintiffs' injury in their efforts to conceal that retaliation, Defendant Officers committed abuse of Process.

D. Fourth Cause of Action: Violation Of Civil Rights Pursuant To 42 U.S.C. 1983

90. Paragraphs 1 through 89 above are realleged and incorporated herein.

91. Defendant Officers were acting under the color of law, when they wrongfully and without probable cause, charged Plaintiffs as more fully set forth above.

92. Defendant Officers' acts violated Plaintiff's constitutional rights.

93. Defendant Officers' deprivation of Plaintiffs' rights caused Plaintiffs' damages.

E. Fifth Cause of Action: Violation Of Civil Rights Pursuant To 42 U.S.C. 1983

94. Paragraphs 1 through 94 above are realleged and incorporated herein.

95. Defendant Officers were acting under the color of law, when they wrongfully and without legal justification retaliated against Plaintiffs by charging each one of them with criminal offenses.

96. The retaliation was based upon a number of reasons including but not limited to Kahoots termination of Mr. Sokol and its initial refusal to rehire him and fire the general manager.

97. Defendant Officers' acts violated Plaintiff's constitutional rights.

98. Defendant Officers' deprivation of Plaintiffs' rights caused Plaintiffs' damages.

VI. Prayer for Relief

WHEREFORE, Plaintiffs pray that this Court:

- A. For compensatory damages, in an amount to be determined at trial, against all defendants, punitive damages; prejudgment and post-judgment interest; costs; attorneys' fees, and such other relief as the Court may deem appropriate.

Respectfully submitted,

/s/ David A. Goldstein

DAVID A. GOLDSTEIN (0064461)
DAVID A. GOLDSTEIN CO., L.P.A.
511 South High Street, Suite 200
Columbus, Ohio 43215
(614) 222-1889; (614) 222-1899 (Fax)
dgoldstein@dgoldsteinlaw.com
Attorney for Plaintiffs

/s/ Rex H. Elliott

REX H. ELLIOTT (0054054)
rexe@cooperelliott.com
BARTON R. KEYES (0083979)
bartk@cooperelliott.com
Cooper & Elliott, LLC
2175 Riverside Drive
Columbus, Ohio 43221
(614) 481-6000
(614) 481-6001 (Facsimile)

Co-Counsel for Plaintiffs

/s/ Gina M. Piacentino

GINA M. PIACENTINO (0086225)
88 East Broad Street, Suite 1560
Columbus, OH 43215
Phone: (614) 221-0800
Fax: (614) 221-0803
Email: gpiacentino@wp-lawgroup.com
Co-Counsel for Plaintiffs

JURY DEMAND

Plaintiffs request a trial on all issues triable to a jury.

/s/ David A. Goldstein

DAVID A. GOLDSTEIN (0064461)

IN THE Franklin COUNTY Municipal Court**FILED**City of Columbus/State of Ohio v. Carla L. Hoover
Person Named in Complaint

17 Nov 12 PM 3:00

Incident Report Number: 173015308ORC-CCC Section/Offense(s): Illegal Sexula Oriented Activity 2907.40 C-2FRANKLIN COUNTY
MUNICIPAL COURT
FOR BACK

Criminal Case Number: _____

EXHIBIT

tabler

A**AFFIDAVIT IN SUPPORT OF PROBABLE CAUSE**

I, Det. S. Rosser, do hereby swear or affirm that I have the following cause to believe the individual named committed the alleged offense(s) for the reason(s) stated in this Affidavit in Support of Probable Cause:

X I have personal knowledge of the facts listed in the statement of facts as I was involved in the underlying investigation and/or arrest.

I have knowledge of the facts listed in statement of facts based on my review of available Columbus Division of Police Reports, which were completed by Columbus Division of Police Officers acting in their official capacity and as a part of their official duties.

Summary Statement of Facts in Support of Probable Cause:

On 10/27/17 at 12:00pm Det. Rosser #77 and Det. Lancaster #1345 entered Kahoot's Gentlemen's Club as a result of multiple complaints received by the Columbus Division of Police claiming the management is allowing prostitution and other criminal acts to occur in the club between patrons and employees.

Around 12:30pm while sitting at a table with a dancer who uses the stage name Dixie, later identified as Carla Hoover via club documents and OHLEG Det. Rosser was asked by Dixie if he would buy a private dance with her. He agreed and followed her back to the private dance area where she escorted him to a booth that faced west and had him take a seat. Once at the booth she removed her top exposing her breasts with only the nipple covered with a pastie. As the song began Dixie mounted Det. Rosser placing her knees down on each side of his hips. She began rubbing her breasts back and forth across Det. Rosser's face making full contact from one side of his face to the other with her breasts. She then leaned back and began grinding back and forth onto Det. Rosser's covered penis with her vaginal area. She then stood up and turned around and then lay back down on Det. Rosser's face grinding her buttock onto his penis. She then laid back and whispered into his ear "You can feel them" referring to her breasts. Det. Rosser briefly reached up and felt her breasts as not to alarm her that he was a police officer. He then lay on his back and she lay on top of him. Once the song ended they both stood up and Det. Rosser handed her \$10.00. She then exited the private dance area while Dixie redressed herself. He returned to the table where Det. Lancaster was still seated.

Signature of Affiant:

Sworn to and subscribed to before me on _____

Franklin County Municipal Court

Lori M. Tyack, Clerk of Court 375 S. HIGH ST., COLUMBUS, OHIO 43215

State of Ohio
County of Franklin
City of Columbus

v: CARLA L. HOOVER
DEFENDANT

173015308

OTHER JURISDICTION

COMPLAINT

Complainant, being duly sworn, states that the above named defendant, at Franklin County / Columbus, Ohio, on or about the 27 day of OCTOBER, 2017 did:

An employee on the premise of a sexually oriented business who regularly appears and at the time of offense nude or semi nude, to wit: (describe nudity)

TOPELESS DANCING

, did knowingly touch a patron or another employee or the clothing of another patron or employee in a specified anatomical area, to wit: (describe contact) RUBBED DET. ROSSER'S CLOTHED PENIS WITH HER VAGINAL & BUTTOCK AREA

, who is not a member of the employees immediate family

in violation of section 2907.40 C-2 ☐ City Code ☒ M.O.R.C. ☐ Misdemeanor ☐ Felony of the First degree.
Complainant S. Rossar SIGNATURE S. ROSSAR PRINT FULL NAME 77 BADGE NUMBER

Columbus Division of Police / Vice Section ADDRESS OR AGENCY & ASSIGNMENT CITY STATE ZIP CODE

Sworn to and subscribed before me, this 9 day of NOVEMBER, 2017

Lori M. Tyack

Clerk of the Franklin County Municipal Court

By Walter L. Kennedy CLERK / DEPUTY CLERK / NOTARY PUBLIC / REAG OFFICER

NO SEAL REQUIRED

Notary Seal / Expiration Date

Lori M. Tyack

Clerk of the Franklin County Municipal Court

ARREST WARRANT

To any law enforcement officer of the State of Ohio:

You are hereby commanded to arrest the above named defendant and bring him/her to the Franklin County Municipal Court without unnecessary delay. If the defendant has been issued a warrant in accordance to CRIMINAL RULE 44, THE WARRANT HAS BEEN ISSUED BEFORE THE DEFENDANT HAS APPEARED AND THE BAIL PROVISION ORIGINAL RULE 46 SHALL APPLY. ARRAIGNMENT COURT IS HELD IN COURTROOM 15A MONDAY THROUGH FRIDAY.

Complaint Number

DA119902 S. Rossar

Case No. 17-23184

Charge: Illegal Sexually Oriented Business

Section Number: 2907.40 C-2

Offense Location: 4522 KENNEDY BL

Name: HOOPER

Street: 51611 W. 1ST ST

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

Zip: 43215

County: FRANKLIN

City: COLUMBUS

State: OH

County Municipal Court

Lori M. Tyack, Clerk of Court 375 S. HIGH ST., COLUMBUS, OHIO 43215

State of Ohio

County of Franklin

City of Columbus

v: CARLA L. HOOVER
DEFENDANT

183002340

OTHER JURISDICTION

18 FEB 15 PM 4:35

FRANKLIN COUNTY
MUNICIPAL COURT
LORI M. TYACK

COMPLAINT

Complainant, being duly sworn, states that the above named defendant, at Franklin County / Columbus, Ohio, on or about the 18 day of OCTOBER, 2017 did:An employee on the premise of a sexually oriented business who regularly appears nude or semirude to wit: (describe nudity) BREASTS UNCOVERED W/ ONLY NIPPLES COVERED, did knowingly touch a patron or another employee or the clothing of a patron or another employee in a specified anatomical area, to wit: (describe contact) MADE CONTACT W/ DET. LANCASTER'S GROIN USING HER VAGINA AND BUTTOCK, who is not a member of the employees immediate familyin violation of section 2907.40 C-2 ☐ City Code ☒ M.R.C., a ☒ Misdemeanor ☐ Felony of the First degree.

Complainant

SIGNATURE

PRINT FULL NAME

BADGE NUMBER

Columbus Division of Police / Vice Section

ADDRESS OR AGENCY & ASSIGNMENT

CITY

STATE

ZIP CODE

Sworn to and subscribed before me, this

15 day of FEBRUARY, 20 18

Lori M. Tyack

Clerk of the Franklin County Municipal Court

By

CLERK / DEPUTY CLERK / NOTARY PUBLIC / REAG OFFICER

NO SEAL REQUIRED

Notary Seal & Expiration Date

☐ ARREST WARRANT

To any law enforcement officer of the State of Ohio:

You are hereby commanded to arrest the above named defendant and bring him/her before the Franklin County Municipal Court without unnecessary delay, to answer to the complaint hereon. WHEN APPLICABLE, IN ACCORDANCE TO CRIMINAL RULE #4, THE WARRANT HAS BEEN ISSUED BEFORE THE DEFENDANT HAS APPEARED AND THE BAIL PROVISION CRIMINAL RULE 46 SHALL APPLY. ARRAIGNMENT COURT IS HELD IN COURTROOM 4C AT 9:00 AM., MONDAY THROUGH FRIDAY.

Lori M. Tyack
Clerk of the Franklin County Municipal Court

State # _____ Control # _____

By _____ DEPUTY DATE _____

Complaint Number

A107519

Issuing Officer

W. LANCASTER

Badge Number

1345

Case No.

1078/18

☐ SUMMONS
☐ WARRANT
☐ MISDEMEANOR CITATION

Charge: Illegal Sexually Oriented Activity

Section Number 2907.40 C-2

☐ City Code☒ M.R.C.

Offense Date 10/20/17

Offense Time 130

AM PM

Offense Location 4522 KENNY RD. 43220

Name HOOVER CARLA L.

Street 5641 WESTLAKE DR.

City GALLOWAY State OH Zip 43119

SEX F RACE W HGT 5'3" WGT 120 HAIR BRN EYES HAZ

DOB [REDACTED] S.S. # [REDACTED] DL / I.D. # [REDACTED]

☒ SUMMONS:

Read Notice #1 on reverse side.

You-MUST appear in courtroom 4C ☒ or 15A ☐ on the date and time indicated. I personally served the Defendant a copy of this Summons on _____ Signature _____

Type of SUMMONS Service Requested:

☐ Personal ☒ Certified Mail☐ CITATION:

Read Notice #2 on reverse side.

Court appearance is OPTIONAL. You must contest this citation by appearing in COURTROOM 4C ☐ COURTROOM 15A ☐ on the date and time indicated.

COURT DATE & TIME

3 | 16 | 2018 | 9 : 00 AM PM
MONTH DAY YEAR TIME

X

This is not an admission of guilt. AN ARREST WARRANT will be issued if you do not properly respond to this charge.

3/15

ORIGINAL / COURT COPY

EXHIBIT

D

Franklin County Municipal Court
Court 375 S. HIGH ST., COLUMBUS, OHIO 43215

2018 MAR -9 AM 11:39

FRANKLIN COUNTY
MUNICIPAL COURT
LORI M. TYACK

TIME STAMP

County of Franklin
City of ColumbusV: EMILY HAUDENSCHIED
DEFENDANT

183003545

OTHER JURISDICTION

COMPLAINT

Complainant, being duly sworn, states that the above named defendant, at Franklin County / Columbus, Ohio, on or about the 20 day of JANUARY, 20 18 did:An employee on the premise of a sexually oriented business who regularly appears nude or seminud
to wit: (describe nudity) DANCE TOPLESS, didknowingly touch a patron or another employee or the clothing of a patron or another
employee in a specified anatomical area, to wit: (describe contact)GRINDED HER VAGINA & BUTTOCK ONTO DET. ROSSER'S PENIS

, who is not a member of the employees immediate family

in violation of section 2907.40 C-2 ☐ City Code ☒ Misdemeanor
☒ O.R.C., a ☐ Felony of the First degree.

Complainant

SIGNATURE

S. Rosser
PRINT FULL NAME77
BADGE NUMBER

Columbus Division of Police / Vice Section

ADDRESS OR AGENCY & ASSIGNMENT

CITY

STATE

ZIP CODE

Sworn to and subscribed before me, this

8 day of MARCH, 20 18

Lori M. Tyack

Clerk of the Franklin County Municipal Court

By

CLERK / DEPUTY CLERK / NOTARY PUBLIC / PEACE OFFICER

NO SEAL REQUIRED

Notary Seal & Expiration Date

☐ ARREST WARRANT

To any law enforcement officer of the State of Ohio:

You are hereby commanded to arrest the above named defendant and bring him/her before the Franklin County Municipal Court without unnecessary delay, to answer to the complaint herein. WHEN APPLICABLE, IN ACCORDANCE TO CRIMINAL RULE #4, THE WARRANT HAS BEEN ISSUED BEFORE THE DEFENDANT HAS APPEARED AND THE BAIL PROVISION CRIMINAL RULE 46 SHALL APPLY. ARRAIGNMENT COURT IS HELD IN COURTROOM 4C AT 9:00 AM., MONDAY THROUGH FRIDAY.

State # _____ Control # _____

By _____ DEPUTY DATE _____

Complaint Number

C136789 Issuing Officer S. Rosser

Badge Number 77

Case No. 18/4898 ☒ SUMMONS
☐ WARRANT ☐ MISDEMEANOR CITATIONCharge: Illegal Sexually Oriented ActivitySection Number 2907.40 C-2 ☐ City Code ☒ O.R.C. Offense Date 3-120/18 Offense Time 1050 AMOffense Location 4522 KENNY RD. 43220 Suspect Cruiser Dist. _____Name HAUDENSCHIED EMILY FIRST MIDDLEStreet 4604 AVA PT.City HELLIARD State OH Zip 43026SEX F RACE W HGT 5'7" WGT 165 HAIR BRO EYES H2LDOB [REDACTED] S.S. # [REDACTED] DL / I.D. # [REDACTED]☒ SUMMONS: Read Notice #1 on reverse side.You MUST appear in courtroom 4C ☒ or 15A ☐ on the date and time indicated. I personally served the Defendant a copy of this Summons on _____ Signature _____Type of SUMMONS Service Requested:
☐ Personal ☒ Certified Mail☐ CITATION: Read Notice #2 on reverse side.Court appearance is OPTIONAL. You must contest this citation by appearing in COURTROOM 4C ☐ COURTROOM 15A ☐ on the date and time indicated.

COURT DATE & TIME

4 | 11 | 18 | 9 : - AM PM
MONTH DAY YEAR TIME

X

This is not an admission of guilt. AN ARREST WARRANT will be issued if you do not properly respond to this charge.

3/15

ORIGINAL/COURT COPY

EXHIBIT

E

Franklin County Municipal Court
375 S. HIGH ST., COLUMBUS, OHIO 43215

17 NOV -0 PM 1:42

FRANKLIN COUNTY
MUNICIPAL COURT
TIME STAMPCounty of Franklin
City of Columbus

V: BRITANY L. YATES

DEFENDANT

173015201

OTHER JURISDICTION

COMPLAINT

Complainant, being duly sworn, states that the above named defendant, at Franklin County / Columbus, Ohio, on or about the 22 day of SEPTEMBER, 20 17 did:

An employee on the premise of a sexually oriented business who regularly appears and at the time of offense nude or semi nude, to wit: (describe nudity)

TOPLESS DANCER W/ G-STRING BOTTOMS, did knowingly touch a patron or another employee or the clothing of another patron or employee in a specified anatomical area, to wit: (describe contact) MASSAGED DET.ROSSER'S PENIS & SCROTUM WITH HER RIGHT HAND

, who is not a member of the employees immediate family

in violation of section 2907.40 C-2 ☐ City Code ☒ Misdemeanor ☐ Felony of the First degree.
Complainant [Signature] S. ROSSER 77
SIGNATURE PRINT FULL NAME BADGE NUMBER

Columbus Division of Police / Vice Section

ADDRESS OR AGENCY & ASSIGNMENT

CITY

STATE

ZIP CODE

Sworn to and subscribed before me, this

7 day of NOVEMBER, 20 17

Lori M. Tyack

Clerk of the Franklin County Municipal Court

By [Signature] # 1215
CLERK / DEPUTY CLERK / NOTARY PUBLIC / REACE OFFICER

NO SEAL REQUIRED

Notary Seal & Expiration Date

Lori M. Tyack

Clerk of the Franklin County Municipal Court

☐ ARREST WARRANT

To any law enforcement officer of the State of Ohio:

You are hereby commanded to arrest the above named defendant and bring him/her before the Franklin County Municipal Court without unnecessary delay, to answer to the complaint hereon. WHEN APPLICABLE, IN ACCORDANCE TO CRIMINAL RULE #4, THE WARRANT HAS BEEN ISSUED BEFORE THE DEFENDANT HAS APPEARED AND THE BAIL PROVISION CRIMINAL RULE 46 SHALL APPLY. ARRAIGNMENT COURT IS HELD IN COURTROOM 4C AT 9:00 AM, MONDAY THROUGH FRIDAY.

Slate # _____ Control # _____

By _____ DEPUTY DATE _____

Complaint Number

DA 119909 Issuing Officer S. ROSSERBadge Number 77Case No. 17-23515☒ SUMMONS
☐ WARRANT
☐ MISDEMEANOR CITATIONCharge: Illegal Sexually Oriented ActivitySection Number 2907.40 C-2 ☐ City Code ☒ R.O.R.C. Offense Date 9-22-17 Offense Time 230 AM ☒ PMOffense Location 4522 KENNY RD. 43220 Suspect Cruiser Dist. _____Name YATES BRITANY L. _____Street 288 AMSTERDAM AVE. _____City COLS. State OH Zip 43207SEX F RACE W HGT 5'8" WGT 130 HAIR BRO EYES GRN

DOB _____ S.S. # _____ DL / I.D. # _____

☒ SUMMONS: Read Notice #1 on reverse side.You MUST appear in courtroom 4C ☒ or 15A ☐ on the date and time indicated. I personally served the Defendant a copy of this Summons on _____ Signature _____Type of SUMMONS Service Requested:
☐ Personal ☒ Certified Mail☐ CITATION: Read Notice #2 on reverse side.Court appearance is OPTIONAL. You must contest this citation by appearing in COURTROOM 4C ☐ COURTROOM 15A ☐ on the date and time indicated.

COURT DATE & TIME

12 | 7 | 17 | 9 : - AM
MONTH DAY YEAR TIME☒ This is not an admission of guilt. AN ARREST WARRANT will be issued if you do not properly respond to this charge.

3/15

ORIGINAL/COURT COPY

EXHIBIT

IMG_1136.jpg

County Municipal Court

Lori M. Tyack, Clerk of Court 375 S. HIGH ST., COLUMBUS, OHIO 43215

State of Ohio

County of Franklin

City of Columbus

v: ASHLEY N. GRAVES

DEFENDANT

OTHER JURISDICTION

173015379

17 NOV 13 PH 2:58

FRANKLIN COUNTY
MUNICIPAL COURT
LORI M. TYACK

COMPLAINT

Complainant, being duly sworn, states that the above named defendant, at Franklin County / Columbus, Ohio, on or about the 15 day of SEPTEMBER, 2017 did:

An employee on the premise of a sexually oriented business who regularly appears and at the time of offense nude or (semi nude) to wit: (describe nudity)

TOPESS DANCING, did knowingly touch a patron or another employee or the clothing of another patron or employee in a specified anatomical area, to wit: (describe contact) STROKESLANCASTER'S CLOTHES PANTS & SCROTUM W/HER RIGHT LEG & KNEE

, who is not a member of the employees immediate family

in violation of section 2907.40 022☐ City Code☒ M.O.R.C.☒ Misdemeanor☐ Felonyof the First degree.

Complainant

SIGNATURE

W. LANCASTER

PRINT FULL NAME

1345

BADGE NUMBER

Columbus Division of Police / Vice Section

ADDRESS OR AGENCY & ASSIGNMENT

CITY

STATE

ZIP CODE

Sworn to and subscribed before me, this

10 day of NOVEMBER, 2017Lori M. Tyack

Clerk of the Franklin County Municipal Court

By

CLERK / DEPUTY CLERK / NOTARY PUBLIC / PEACE OFFICER

NO SEAL REQUIRED

☐ ARREST WARRANT

To any law enforcement officer of the State of Ohio:

You are hereby commanded, to arrest the above named defendant and bring him/her before the Franklin County Municipal Court without unnecessary delay to answer to the complaint. WHEN APPLICABLE, IN ACCORDANCE TO CRIMINAL RULE 48, IF THE WARRANT HAS BEEN ISSUED BEFORE THE DEFENDANT HAS APPEARED AND THE BAIL PROVISIONS OF CRIMINAL RULE 48 SHALL APPLY, ARRAIGNMENT COURT IS HELD IN COURTROOM 1000 MONDAY THROUGH FRIDAY.

Notar Seal & Expiration Date

LORI M. TYACK

Clerk of the Franklin County Municipal Court

FILED

DATE

By

DATE

DATE

Complaint Number

DA 119922

W. LANCASTER

1345

Case No.

17-23788

Charge:

Section:

Number:

Offense:

Location:

Name:

Street:

City:

State:

Zip:

File:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

Date:

Time:

Signature:

Title:

EXHIBIT

tabbies

6

Franklin County Municipal Court

Lori M. Tyack, Clerk of Court 375 S. HIGH ST., COLUMBUS, OHIO 43215
State of Ohio
County of Franklin
City of Columbus

v. CHELSEA P. EWART
DEFENDANT

173 015455

17 NOV 28 PM 7:12

FRANKLIN COUNTY
MUNICIPAL COURT
LORI M. TYACK

OTHER JURISDICTION

COMPLAINT

Complainant, being duly sworn, states that the above named defendant, at Franklin County / Columbus, Ohio, on or about the 15 day of SEPTEMBER, 20 17 did:

An employee on the premise of a sexually oriented business who regularly appears and at the time of offense nude or semi nude, to wit: (describe nudity)

TOPELESS DANCING

, did knowingly touch a patron or another employee or the clothing of another patron or employee in a specified anatomical area, to wit: (describe contact) GRABBED DET.

LANCASTER'S PANTS DURING A PRIVATE DANCE

, who is not a member of the employees immediate family.

in violation of section 2907.40 C-2 ☐ City Code ☒ Misdemeanor ☐ Felony of the First degree.
Complainant W. LANCASTER #1345 1345
SIGNATURE PRINT FULL NAME BADGE NUMBER

Columbus Division of Police / Vice Section
ADDRESS OR AGENCY & ASSIGNMENT CITY STATE ZIP CODE

Sworn to and subscribed before me, this 13 day of NOVEMBER, 20 17

Lori M. Tyack
Clerk of the Franklin County Municipal Court

By [Signature] #77
CLERK / DEPUTY CLERK / NOTARY PUBLIC / RECORDER

NO SEAL REQUIRED

Notary Seal & Expiration Date

Lori M. Tyack
Clerk of the Franklin County Municipal Court

Control #

ARREST WARRANT

To any law enforcement officer of the State of Ohio:
You are hereby commanded to arrest the above named defendant and bring him/her before the Franklin County Municipal Court without unnecessary delay to answer to the complaint on which this warrant is issued. WHEN APPLICABLE IN ACCORDANCE TO CRIMINAL RULE 60 THE WARRANT MAY BE ISSUED BEFORE THE DEFENDANT HAS APPEARED AND THE FAILURE TO COMPLY WITH CRIMINAL RULE 60 SHALL APPLY. ARRAIGNMENT COURT IS HELD IN COLUMBUS, OHIO ON MONDAY THROUGH FRIDAY.

Complainant Number

DA 119920 W. LANCASTER

Case No. 17-24764

Charge: Unlawful Sexual Contact

Section Number: 2907.40 C-2

Offense: 17-24764

Location: 17-24764

Name: W. LANCASTER

Street: 17-24764

City: 17-24764

SUMMONS. Read Notice #1 on reverse side.
and file in the court room 4C or 15A on the date and
and make it personally served the Defendant a copy of this
summons on _____ Signature

SUMMONS Service Requested:
☐ Personal ☒ Certified Mail

NOTICE. Read Notice #2 on reverse side.
You must contest this citation by
in COURTROOM 15A or COURTROOM 16A on the
date and time specified below.

COURT DATE & TIME

11/17/19

BM